

# **ATTACHMENT EG-1**

**NCC's Responses to Verizon's First Set of Data Requests  
(minus attachments)**



August 21, 2007

DICKS & WORKMAN

2720 Symphony Towers 750 B Street  
San Diego, California 92101-8122  
T: (619) 685-6800 F: (619) 557-2735

Via Electronic Mail:

([randy.vogelzang@verizon.com](mailto:randy.vogelzang@verizon.com))  
& ([deborah.kuhn@verizon.com](mailto:deborah.kuhn@verizon.com))

A. Randall Vogelzang  
General Counsel  
Verizon Great Lakes Region  
600 Hidden Ridge, HQE02J27  
Irving, Texas 75038

Deborah Kuhn  
Assistant General Counsel  
Verizon Great Lakes Region  
205 North Michigan Avenue, Suite 1100  
Chicago, Illinois 60601

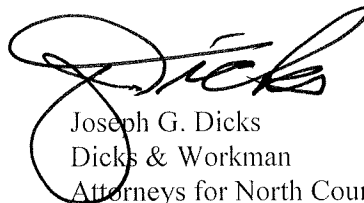
Re: *North County Communications Corp. v. Verizon*, ICC Docket No. 07-0428  
North County's Responses to Verizon's First Set of Data Requests

Dear Mr. Vogelzang and Ms. Kuhn:

North County Communications Corporation ("NCC") hereby submits its responses to the First Set of Data Requests submitted by Verizon North Inc. and Verizon South Inc. (collectively, "Verizon") on August 7, 2007.

The responses are appended hereto at Attachment 1. Each response begins on a separate sheet, lists the request and docket numbers at the top of the page, sets forth verbatim Verizon's request, provides NCC's response, and provides the name, title, company and number of the party responsible for providing the information requested.

Very truly yours,



Joseph G. Dicks  
Dicks & Workman  
Attorneys for North County Communications Corp.

cc: All Parties on the Service List  
for ICC Docket No. 07-0428

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 1, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Does NCC provide telecommunications services to any residential customers in Illinois? If so, please identify how many residential customers NCC currently has in Illinois.

RESPONSE: NCC objects to this request on the grounds that it seeks information wholly irrelevant to the subject matter of this action and that it is not reasonably calculated to lead to the discovery of admissible evidence.

Notwithstanding and without waiving its objections, NCC states that it does not currently provide telecommunications services to any residential customers in Illinois.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 2, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Does NCC provide telecommunications services to any business customers in Illinois that are not call centers, high volume accounts, ISPs, VoIP providers or voicemail providers, as those terms are used on NCC's website? If so, please identify how many such business customers NCC currently has in Illinois.

RESPONSE: NCC objects to this request on the grounds that it seeks information wholly irrelevant to the subject matter of this action and that it is not reasonably calculated to lead to the discovery of admissible evidence. The statutes prohibiting anticompetitive conduct that impedes the development of competition in the telecommunications service market do not distinguish between types of end users.

Notwithstanding and without waiving its objections, NCC states: No.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 3, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Does NCC provide telecommunications services to any business customers in Illinois that are call centers, high volume accounts, ISPs, VoIP providers or voicemail providers, as those terms are used on NCC's website? If so, please identify how many such business customers NCC currently has in Illinois.

RESPONSE: NCC objects to this request on the grounds that it seeks information wholly irrelevant to the subject matter of this action and that it is not reasonably calculated to lead to the discovery of admissible evidence. The statutes prohibiting anticompetitive conduct that impedes the development of competition in the telecommunications service market do not distinguish between types of end users.

Notwithstanding and without waiving its objections, NCC states that the answer to this request is yes, three (3).

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 4, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please define the following terms, as those terms are used on NCC's website:

(a) call centers (please state whether the definition includes both inbound and outbound call centers, or only inbound or only outbound call centers)

(b) high volume accounts

(c) ISPs

(d) VoIP providers

(e) voicemail providers

RESPONSE: NCC objects to this request on the grounds that it seeks information wholly irrelevant to the subject matter of this action and that it is not reasonably calculated to lead to the discovery of admissible evidence. The various types of end users served by NCC have absolutely no relevance to the subject matter of this action.

Notwithstanding and without waiving its objections, NCC provides the following definitions to the above-lettered requests:

(a) Call centers include both inbound and outbound call centers;

(b) High volume accounts refers to customers that make or receive many phone calls;

(c) ISPs means Internet service providers

(d) VoIP provider means a company that provides service using voice over Internet protocol; and

(e) Voicemail providers refers to companies that provide voice messaging services.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 5, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please produce copies of NCC's current Illinois tariffs, or, in the alternative, a link to a website or websites from which NCC's current Illinois tariffs are publicly accessible.

RESPONSE: Copies of the requested tariffs are appended hereto at Exhibit A.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 6, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please state whether NCC offers any service in Illinois under which it charges its end users a specific rate for transmitting those end users' calling names to the Caller ID displays of other telecommunications carriers' end users.

RESPONSE: NCC objects to this request on the basis that the request seeks information wholly irrelevant to the subject matter of this action and that it is not reasonably calculated to lead to the discovery of admissible evidence. The rate that NCC charges or does not charge for the transmission of its end users' calling name information has no bearing on Verizon's anticompetitive conduct that prohibits or otherwise hinders NCC's ability to store such information in its own database and make that information available to querying carriers.

Notwithstanding and without waiving its objections, NCC states that the transmission of NCC's end users' calling names to Caller ID displays is not billed as a separate charge apart from the monthly service charge.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750



RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 7, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please state whether NCC offers any service in Illinois under which it charges its end users a specific rate for permitting or enabling those end users to receive (a) third party billed calls, and/or (b) collect calls.

RESPONSE: NCC objects to this request on the basis that the request seeks information wholly irrelevant to the subject matter of this action and that it is not reasonably calculated to lead to the discovery of admissible evidence. The rate that NCC charges or does not charge its end users for the ability to receive collect or third-party billed calls has no bearing on Verizon's conduct that prohibits or otherwise hinders NCC's ability to store such information in its own database, to make that information available to querying carriers. Furthermore the request has no relevance to whether Verizon's conduct deprives NCC's customers of certain services.

Notwithstanding and without waiving its objections, NCC states that the rate for permitting or enabling its end users to receive (a) third party billed calls, and/or (b) collect calls is included in the monthly service charge.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 8, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please state whether NCC offers Caller ID blocking services in Illinois.

RESPONSE: Yes.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 9, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please identify how many complaints of any kind that NCC has received from its Illinois end users regarding the following circumstances, and please produce all documents and records relating to such complaints:

- (a) their Calling Name ("CNAM") information not appearing on the Caller ID units of Verizon's end users;
- (b) not being able to accept collect calls from Verizon's end users; and
- (c) not being able to accept third-party billed calls from Verizon's end users.

RESPONSE: NCC objects to this request on the basis that the request seeks information wholly irrelevant to the subject matter of this action and that it is not reasonably calculated to lead to the discovery of admissible evidence. The existence or absence of consumer complaints has no relevance to whether Verizon's conduct deprives NCC's customers of certain services.

Notwithstanding and without waiving its objections, NCC states it is unaware of any Illinois end user complaints regarding the above-noted items; after all, Verizon has advised it will only stop the service when NCC insists on hosting its own data, as opposed to conceding to Verizon's demand that NCC host its data with Verizon or a Verizon approved third party. NCC's customers and Verizon's customers will be very upset when Verizon stops displaying, on Verizon's customers' caller id displays, NCC's calling party's name data (after all Verizon's customers are paying for a service they will not always be getting). In addition, NCC's customers will complain where the failure to display the information causes NCC's telemarketing customers to be exposed to an \$11,000 per violation fine for violating federal regulations which require the transmission of telemarketer calling name information. [See: 47 CFR 1.80(b)(3); \$11,000 per violation].

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 10, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please identify how many (a) CNAM queries, and (b) Line Information Database (“LIDB”) queries NCC has received from Verizon over the past two years (whether made directly to NCC or via a third party database provider). If NCC cannot provide a Verizon-specific query count, please identify how many (a) CNAM queries, and (b) LIDB queries NCC has received from all telecommunications carriers in Illinois over the past two years (whether made directly to NCC or via a third party database provider).

RESPONSE: NCC objects to this request on the grounds that it seeks information wholly irrelevant to the subject matter of this action and that it is not reasonably calculated to lead to the discovery of admissible evidence. The number of queries performed or received has no bearing on the subject matter of this action or on whether Verizon’s actions are prohibited and anticompetitive. Furthermore, NCC objects to this request on the basis that the information is equally available to Verizon and in Verizon’s custody, control and/or possession.

Notwithstanding and without waiving its objections, NCC states that NCC has received approximately 68,000,000 CNAM queries from Verizon since January, 2006. Verisign does not provide NCC with the information to determine how many LIDB queries NCC has received from all telecommunications carriers in Illinois over the past two years (whether made directly to NCC or via a third party database provider) or how many LIDB queries NCC has received from Verizon over the past two years (whether made directly to NCC or via a third party database provider).

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 11, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please identify how many (a) CNAM queries, and (b) LIDB queries NCC has made over the past two years to Verizon's CNAM and LIDB databases, whether directly or via a third party database provider.

RESPONSE: NCC objects to this request on the grounds that it seeks information wholly irrelevant to the subject matter of this action and that it is not reasonably calculated to lead to the discovery of admissible evidence. The number of queries performed or received has no bearing on the subject matter of this action or on whether Verizon's actions are prohibited and anticompetitive. Furthermore, NCC objects to this request on the basis that the information is equally available to Verizon and in Verizon's custody, control and/or possession.

Notwithstanding and without waiving its objections, NCC states NCC has made approximately 12,000 LIDB queries to Verizon since January, 2006. NCC has made approximately 166 CNAM queries to Verizon since January, 2006.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 12, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please identify how many (a) CNAM queries, and (b) LIDB queries NCC has made over the past two years to third party database providers.

RESPONSE: NCC objects to this request on the grounds that it seeks information wholly irrelevant to the subject matter of this action and that it is not reasonably calculated to lead to the discovery of admissible evidence. The number of queries performed or received has no bearing on the subject matter of this action or on whether Verizon's actions are prohibited and anticompetitive.

Notwithstanding and without waiving its objections, NCC states that it has made approximately 145,000 LIDB queries and 1740 CNAM queries since January, 2006.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 13, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please state how many “direct agreements” (as that term is used in Paragraphs 18 and 35 of the Verified Complaint) NCC has with Illinois telecommunications carriers under which those Illinois telecommunications carriers purchase NCC’s CNAM and/or LIDB data directly from NCC. If such agreements exist, please provide a list of the CNAM and LIDB query rates charged or received by NCC thereunder.

RESPONSE: NCC objects to this request on the grounds that it seeks information wholly irrelevant to the subject matter of this action and that it is not reasonably calculated to lead to the discovery of admissible evidence. The number of direct LIDB/CNAM agreements NCC has with other carriers does not absolve Verizon’s anticompetitive behaviors that are the subject matter of this action.

Notwithstanding and without waiving its objections, NCC states that the answer to this data request is none.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 14, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please state how many contracts NCC has with third party CNAM and/or LIDB database providers under which those third party CNAM and/or LIDB database providers purchase NCC's CNAM and/or LIDB data. If such agreements exist, please provide a list of the CNAM and LIDB query rates charged or received by NCC thereunder.

RESPONSE: NCC objects to this request on the grounds that it seeks information wholly irrelevant to the subject matter of this action and that it is not reasonably calculated to lead to the discovery of admissible evidence. The number of LIDB/CNAM agreements NCC has with third party database providers does not absolve Verizon's anticompetitive behaviors that are the subject matter of this action. Furthermore, the query rates charged or received are irrelevant because Verizon has refused to enter into an agreement with NCC that mirrors and reciprocates the existing LIDB/CNAM contract under which NCC obtains Verizon's LIDB/CNAM information from Verizon.

Notwithstanding and without waiving its objections, NCC states that the answer to this data request is none. Furthermore, NCC notes that third-party database providers like Verisign are not local exchange carriers and have no reason to purchase LIDB/CNAM data from NCC.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750



RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 15, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please state how many contracts NCC has with third party CNAM and/or LIDB database providers under which NCC purchases CNAM and/or LIDB data from those providers. If such agreements exist, please provide a list of the CNAM and LIDB query rates billed to or paid by NCC thereunder.

RESPONSE: NCC objects to this request on the grounds that it seeks information wholly irrelevant to the subject matter of this action and that it is not reasonably calculated to lead to the discovery of admissible evidence. The number of LIDB/CNAM agreements NCC has with third party database providers does not absolve Verizon's anticompetitive behaviors that are the subject matter of this action. Furthermore, the query rates charged or received are irrelevant because Verizon has refused to enter into an agreement with NCC that mirrors and reciprocates the existing LIDB/CNAM contract under which NCC obtains Verizon's LIDB/CNAM information from Verizon.

Notwithstanding and without waiving its objections, NCC states that the answer to this data request is one, with Verisign. When NCC accesses CNAM and LIDB information through Verisign, NCC pays the LEC's per query rate, plus Verisign's additional fees. Verizon's use of the term "competitive" to describe the availability of CNAM/LIDB data is misleading. The third party entities with whom Verizon wants NCC to host NCC's data do not host Verizon's data. Using SS7, for an additional mark-up fee, the third parties merely act as a conduit to Verizon's database computer.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 16, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please identify how many (a) CNAM records, and (b) LIDB records NCC currently has stored in third party databases.

RESPONSE: NCC has approximately ten thousand (10,000) Illinois LIDB/CNAM records stored in third-party databases, because Verizon has advised that it will not agree to access NCC's CNAM/LIDB information if NCC stores its own data.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 17, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: With respect to Paragraphs 29-31 of the Verified Complaint, please state (a) whether NCC is currently hosting its own CNAM database, and (b) whether NCC is currently hosting its own LIDB database. If your response to either subpart is no, please provide the date upon which NCC will (i) begin hosting, or establish a hub, for its own CNAM/LIDB data storage, and (ii) be capable of receiving and processing queries, or “dips” into NCC’s CNAM/LIDB databases from other telecommunications carriers.

RESPONSE: NCC is currently capable of hosting its own LIDB/CNAM data. The data is in an NCC database and ready to go live. Because of Verizon’s dominance in the geographical area in Illinois, and in light of the fact that Verizon is by far the largest carrier in its service territory, NCC cannot switch to its own database until Verizon agrees to obtain the LIDB/CNAM data from that database.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 18, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please state whether NCC has a Signaling System 7 (“SS7”) network. If your response is no, please state how NCC anticipates that other telecommunications carriers would access NCC’s CNAM and/or LIDB data if NCC were hosting its own CNAM and/or LIDB databases.

RESPONSE: Yes, NCC has an SS7 network.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 19, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please admit or deny that it is more economical for Verizon to enter into agreements to purchase CNAM and/or LIDB information from third party CNAM and/or LIDB database providers than for Verizon to enter into “direct agreements” (as that term is used in Paragraphs 18 and 35 of the Verified Complaint) with each Illinois telecommunications carrier for the purchase of each Illinois telecommunications carrier’s CNAM and/or LIDB data. If your response is a denial, please state all facts upon which your denial is based.

RESPONSE: NCC is without sufficient information at this time to affirm or deny.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 20, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please identify all legal authorities upon which NCC bases its claim that Verizon must purchase CNAM and/or LIDB data directly from NCC rather than from third party CNAM and/or LIDB providers.

RESPONSE: NCC objects to this request to the extent it seeks information protected as attorney work-product. Furthermore, NCC objects to this request on the basis that it is unduly burdensome for NCC to list the many legal reasons that prohibit Verizon from engaging in the actions that are the subject matter of this complaint. Moreover, NCC objects to this request on the grounds that the request is uncertain, ambiguous and confusing in that it asks NCC to address an issue that is neither a claim asserted by NCC nor a valid defense asserted by Verizon.

Notwithstanding and without waiving its objections, NCC refers Verizon to NCC's Verified Complaint, NCC's Opposition to Verizon's Motion to Dismiss, and Staff's Response to Verizon's Motion to Dismiss for a discussion of the legal issues and authorities that prohibit Verizon from engaging in the conduct that is the subject matter of this action, which are incorporated herein by this reference.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 21, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please produce all documents and identify all communications supporting NCC's assertion that "Verizon insists that North County store its data with a particular vendor preferred by Verizon," as alleged in Paragraph 25 of the Verified Complaint.

RESPONSE: NCC objects to this request on the basis that the information is equally available to Verizon and in Verizon's custody, control and/or possession.

Notwithstanding and without waiving its objections, the requested documents are appended hereto at Exhibit B.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 22, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please produce all documents and identify all communications supporting NCC's assertion that Verizon has attempted to "dictate how, where and with whom North County stores its LIDB and CNAM information for Verizon's access," as alleged in Paragraph 31 of the Verified Complaint.

RESPONSE: NCC objects to this request on the basis that the information is equally available to Verizon and in Verizon's custody, control and/or possession.

Notwithstanding and without waiving its objections, the requested documents are appended hereto at Exhibit B. There were a number of telephone conference calls between Randy Vogelzang, Joseph Dicks and Todd Lesser regarding NCC's concerns and attempts to resolve them during the period of time of the attached e-mails.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750



RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 23, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please identify the amount of the “substantial fees” NCC asserts that it pays to third parties in order to populate, store and update NCC’s end user line and CNAM information in the databases of such third parties, as alleged in Paragraph 26 of the Verified Complaint.

RESPONSE: NCC currently uses a third-party database provider to store its LIDB/CNAM information, and that provider retains sixty percent (60%) of all money it collects for query charges.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 24, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please admit or deny that even if Verizon does not enter into the “direct agreement” (as that term is used in Paragraphs 18 and 35 of the Verified Complaint) with NCC that is requested in the Verified Complaint, NCC’s end users’ telephone numbers will be transmitted to the Caller ID displays of Verizon end users. If your response is a denial, please state all facts upon which your denial is based.

RESPONSE: Deny on the basis that Verizon has said it will not query the database if it has to pay for queries when NCC switches to hosting its own LIDB/CNAM data in its own database.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 25, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please explain in detail why “the nature of populating, storing, updating, querying and transmitting LIDB and CNAM information requires that the information be stored in a single location,” as alleged in Paragraph 31 of the Verified Complaint.

RESPONSE: NCC objects to this request on the basis that the information is equally available to Verizon and in Verizon’s custody, control and/or possession.

Notwithstanding and without waiving its objections, NCC states that Verizon is well aware of the technical aspects of LIDB/CNAM database storage. To that end, Verizon knows that, although the LIDB and CNAM databases of a specific carrier may use the same SS7 point code, there can be only one SS7 point code that designates where LIDB data is stored for a specific number and one SS7 point code that designates where CNAM data is stored for a specific number

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 26, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please explain in detail how Verizon has done each of the following, as alleged in Paragraph 33 of the Verified Complaint:

- (a) “unreasonably refus[ed] or delay[ed] interconnections or collocation or provid[ed] inferior connections to another telecommunications carrier;”
- (b) “unreasonably impair[ed] the speed, quality, or efficiency of services used by another telecommunications carrier;”
- (c) “unreasonably refus[ed] or delay[ed] access by any person to another telecommunications carrier;”
- (d) “unreasonably act[ed] or fail[ed] to act in a manner that has a substantial adverse effect on the ability of another telecommunications carrier to provide service to its customers;” and
- (e) “violat[ed] the terms of the or unreasonably delay[ed] implementation of an interconnection agreement entered into pursuant to Section 252 of the Federal Telecommunications Act of 1996 in a manner that unreasonably delays, increases the cost, or impedes the availability of telecommunications services to its customers.”

RESPONSE: NCC objects to this request to the extent it seeks information protected by attorney work-product protections. Furthermore, NCC objects to this request on the basis that it is unduly burdensome and duplicative for NCC to list the many facts that demonstrate Verizon is engaging in actions prohibited by 220 ILCS 5/13-514.

Notwithstanding and without waiving its objections, NCC refers Verizon to NCC’s Verified Complaint, NCC’s Opposition to Verizon’s Motion to Dismiss, and Staff’s Response to Verizon’s Motion to Dismiss, all of which are incorporated herein by this reference, for a discussion of the factual and legal issues regarding Verizon’s unlawful conduct that is the subject matter of this action.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 27, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please identify all paragraphs of the Verified Complaint that allege facts demonstrating (a) a breach of the interconnection agreement identified in Paragraph 9 of the Verified Complaint, and (b) a breach of the CNAM/LIDB contract identified in Paragraph 11 of the Verified Complaint.

RESPONSE: NCC is unaware of any alleged breach of contract claims in its Verified Complaint.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 28, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please admit or deny that even if NCC entered into a “direct agreement” (as that term is used in Paragraphs 18 and 35 of the Verified Complaint) with Verizon for Verizon’s purchase of NCC’s CNAM and/or LIDB data, NCC would continue to use third party vendors for storage of NCC’s CNAM and/or LIDB information.

RESPONSE: Deny.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 29, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please admit or deny that NCC received a proposed CNAM/LIDB storage agreement from Verizon that would have allowed NCC to store its CNAM/LIDB data with Verizon for no charge.

RESPONSE: NCC admits that Verizon proposed a LIDB/CNAM storage agreement under which Verizon would store NCC's LIDB/CNAM information (1) without charging NCC to host NCC's data, (2) without paying NCC for Verizon access to and querying of NCC's data, and (3) charging third parties for accessing and querying NCC's data but keeping all money received from third parties for such access and queries.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 30, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please admit or deny that NCC refuses to store its CNAM/LIDB data with a third party unless NCC is compensated for each query, or “dip,” to its CNAM/LIDB data.

RESPONSE: NCC admits that Verizon proposed a LIDB/CNAM storage agreement under which Verizon would store NCC’s LIDB/CNAM information (1) without charging NCC to host NCC’s data, (2) without paying NCC for Verizon access to and querying of NCC’s data, and (3) charging third parties for accessing and querying NCC’s data but keeping all money received from third parties for such access and queries. Further, NCC admits that it declined Verizon’s proposal of the aforementioned terms.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750



RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 31, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please admit or deny that other telecommunications carriers can currently query, or “dig,” NCC’s customer data for CNAM/LIDB purposes, whether directly or through third party database providers.

RESPONSE: NCC is without knowledge to admit or deny the capabilities of other carriers.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

RESPONSE OF NORTH COUNTY COMMUNICATIONS CORPORATION TO  
VERIZON DATA REQUEST NO. 32, DATED AUGUST 7, 2007  
DOCKET NO. 07-0428 BEFORE THE ILLINOIS COMMERCE COMMISSION

REQUEST: Please produce all documents that NCC intends to use at hearing.

RESPONSE: NCC will produce all documents it intends to use at hearing as NCC identifies them.

Person(s) Responsible for Providing Information Requested:

Todd Lesser, President, North County Communications Corporation, 619.364.4750

**NORTH COUNTY COMMUNICATIONS  
CORPORATION,**

**vs.**

**VERIZON NORTH, INC. and VERIZON SOUTH, INC.,**

### Respondents.

I, Alfonso Rivera, certify that I caused the foregoing “North County’s Responses to Verizon’s First Set of Data Requests” to be served upon all parties on the attached service list on this 22nd day of August, 2007, by electronic mail.

Alfonso Rivera

**SERVICE LIST**

ICC Docket No. 07-0428

Stefanie R. Glover  
Office of General Counsel  
Illinois Commerce Commission  
160 N. LaSalle St., Ste. C-800  
Chicago, IL 60601  
[sglover@icc.illinois.gov](mailto:sglover@icc.illinois.gov)

Matthew L. Harvey  
Office of General Counsel  
Illinois Commerce Commission  
160 N. LaSalle St., Ste. C-800  
Chicago, IL 60601  
[mharvey@icc.illinois.gov](mailto:mharvey@icc.illinois.gov)

James Zolnierek  
Illinois Commerce Commission  
527 East Capitol Ave.  
Springfield, IL 62701  
[jzolnier@icc.illinois.gov](mailto:jzolnier@icc.illinois.gov)

Philip J. Wood Jr., Vice President  
Public Affairs Policy & Communications  
Verizon North/South Inc.  
1312 E. Empire St., ILLARA  
P.O. Box 2955  
Bloomington, IL 61702  
[philip.j.wood.jr@verizon.com](mailto:philip.j.wood.jr@verizon.com)

Deborah Kuhn  
Verizon  
205 North Michigan Avenue, 11<sup>th</sup> Floor  
Chicago, Illinois 60601  
[deborah.kuhn@verizon.com](mailto:deborah.kuhn@verizon.com)

A. Randall Vogelzang  
Verizon  
HQE02J27  
600 Hidden Ridge  
Irving, TX 75038  
[randy.vogelzang@verizon.com](mailto:randy.vogelzang@verizon.com)

## **ATTACHMENT EG-2**

**Materials from Verizon's website, tariffs and Caller ID fulfillment package**



Se

Internet

TV

Phone

Bundles

Wireless

Sup

Home Residential

## Caller ID

Per Use Fee: n/a

Monthly Fee: \$7.95

Add to Cart

### Know who's calling before you pick up the phone.

Caller ID lets you see the names and telephone numbers\* of incoming calls on a small display unit or display phone, and provides a convenient way to manage and track all your incoming calls.

You'll see the names and numbers of your callers, so you can decide whether to take the call now or return the call later.

You can store the names, numbers, dates and times of calls, even if callers hang up or don't leave a message.

\*The name and/or number of your caller may not be displayed for every incoming call. In some cases, you will see a message on your Caller ID display unit instead of the name and number of the caller. The exact wording of the message may vary depending upon your display unit. "Out of Area" or "Unavailable" messages are from calls made outside specially equipped areas and calls made through an operator. "Private" or "Anonymous" messages are from calls made by people who have blocked the display of their telephone information.

You can block "Private" or "Anonymous" calls by activating Anonymous Call Block (ACB). You may choose to order ACB for an additional monthly charge, with or without your Caller ID service.

### Resources

Product Instructions  
(Requires Adobe Reader)



[Back](#)

This feature comes with the Verizon 30-Day Customer Satisfaction Guarantee. If at any time you are not satisfied, call your local Verizon Business Office to service and receive a full credit of the monthly service charge on your phone bill.

All features are subject to availability and compatibility restrictions. Additional charges may apply.

A special Caller ID display device is required and may be purchased from a local retailer of your choice.

Pricing information is based upon the state or area code and telephone number you provided. Ranges of prices are offered for some products, and additional charges may apply. Pricing may not reflect current promotional pricing. In the event of a discrepancy between the information contained here and the applicable tariff, the applicable tariff shall prevail. If pricing information is not available, [contact Verizon](#) for more details. Detailed pricing information will be available when you place your order.

[About Us](#) | [Contact Us](#) | [Careers](#) | [Our Stores](#) | [Site Map](#) | [Privacy Policy](#)

[Terms and Conditions](#) | [RSS](#) | © 2007 Verizon

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GENERAL SERVICES

- |      |   |             |
|------|---|-------------|
| 1.   | Calling Services  | T           |
| .1   | General   |             |
| .1.1 | Calling Services provide for Call Waiting/Cancel Call Waiting, Call Forwarding, Speed Dialing-8, Speed Dialing-30, Three-way Calling, Call Forwarding Busy Line-Fixed, Call Forwarding No Answer-Fixed, Call Forwarding Busy Line/Don't Answer-Fixed, Camp-On/Busy Number Redial, Last Number/Save Number Redial and Distinctive Ring features in either individual or packaged configurations. | T<br>I<br>T |
| .1.2 | Calling Services include Distinctive Ring and Custom Local Area Signaling Service (CLASS) and are available in suitably equipped Central Offices.   | T<br>T      |
| a.   | Custom Local Area Signaling Service (CLASS) services include *69, Priority Call, Do Not Disturb, Call Block, Busy Redial, Select Call Forwarding, Special Call Waiting, Caller ID, Cancel Calling Number Delivery - Per Call and Call Trace. CLASS is a custom calling service offered to single and multiline residential and business customers.  | T<br>T      |
| .2   | Conditions  |             |
| .2.1 | Calling Services restrictions:  | T           |
| a.   | Unless otherwise restricted below, services may be used with all one party Exchange Telephone Service lines or trunks, with the exception of Customer Owned Coin Telephone Exchange Service or COPT Coin Line Service.  |             |
| a.1  | Call Waiting is not offered for use with rotary hunting group lines or trunks terminating in Multiline Telephone Systems.   |             |
| a.2  | Call Waiting and/or Three-way Calling are not offered for use with rotary hunting group trunks terminating in Private Branch Exchange or Electronic Private Branch Exchange systems.  |             |
| b.   | Custom Local Area Signaling Service (CLASS) restrictions:   |             |
| b.1  | CLASS services are subject to available facilities and limited to central offices specifically equipped to provide such service. CLASS features are applicable to calls placed to/from compatible central offices offering this service.  |             |
| b.2  | Operator assisted calls may override CLASS features.  |             |
| b.3  | Customer Owned Coin Telephone Exchange Service and COPT Coin Line Service. will not be enabled with CLASS services, just as they are not enabled with other SmartCall Services. They will operate with the CLASS system, however, and interaction with all the services will be permitted.  |             |

GENERAL SERVICES

- |       |  |                 |
|-------|--|-----------------|
| 1.    | Calling Services (Continued)   | T               |
| .3    | Feature Descriptions (Continued)   |                 |
| .3.8  | <u>Call Forwarding Busy Line/Don't Answer-Variable</u> - permits the customer to have incoming calls transferred to another telephone number when their number is busy or not answered after a specified number of rings. The customer is responsible for the establishment and change of the forwarded telephone number destination. The customer is also responsible for feature activation and deactivation as well as reestablishing the forwarded telephone number upon interruption of the service. Where a message toll charge is applicable to a call between the customer's station and the telephone number to which calls are to be forwarded, such charge will be billed to the Call Forwarding customer (see NOTE). This service is not available in connection with rotary or trunk hunting service.         | T               |
|       | <u>NOTE:</u> The grade of transmission on forwarded calls may vary depending on the distance and routing necessary to complete the call. Therefore, the normal grade end-to-end transmission is not guaranteed.  |                 |
| .3.9  | <u>Call Trace</u> - allows the customer to immediately and automatically trace the last incoming call answered from a local service area in which Custom Local Area Signalling Service (CLASS) features are offered. Upon the customer's request, the trace information will be provided to law enforcement agencies by the Company, but will not be released directly to the customer. To initiate the call trace, the customer must contact the Company at the number provided in the voice announcement within ten (10) days of the incident. Call Trace performs the function of recording call information, but in no way identifies the person(s) actually placing the call(s). By accepting the service, the customer agrees that Verizon shall not be liable for damages due to an inability to trace the call(s). | T<br><br>T<br>T |
| .3.10 | <u>Call Waiting/Cancel Call Waiting</u> - provides a tone signal to indicate to a customer who is using his station that another call is trying to reach him. The customer can answer the incoming call while holding his original call, as well as alternately talk to either the first or second calling party. Cancel Call Waiting - permits the customer with Call Waiting to inhibit the operation of call waiting for one call. Call Waiting is automatically restored to the customer's line upon a disconnect.   |                 |
| .3.11 | <u>Caller ID - Number Only</u> - provides for the display of the incoming telephone number on a customer provided display device attached to the customer's telephone line or on a telephone or answering machine with a built-in display screen. The Caller ID - Number Only feature will forward the calling number from the appropriately equipped central office to the customer provided display device. The Company will forward all telephone numbers subject to technical limitations.   | T<br>T          |
|       | All customer provided equipment used to interface with Caller ID - Number Only must be connected in accordance with the provisions of the Federal Communication Commission's Registration Program.   | T               |
| .3.12 | <u>Camp-On/Busy Number Redial</u> - permits the customer to dial a camp-on code when a busy station is reached. The call is retried automatically through the central office until both parties are available. A special tone alerts the customer that a successful camp-on has been activated. When the customer answers, the called party's line is rung, and the two parties are connected in a normal two-way call. Only busy calls within the central office are retried automatically.   | X<br> <br>X     |

X - This service is grandfathered to existing customers at existing locations.



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GENERAL SERVICES

1. Calling Services (Continued)

.3 Feature Descriptions (Continued)

.3.19 Speed Dialing-8 - permits the customer to call other telephone numbers by dialing a one digit code rather than the complete telephone number. The speed calling list is established and maintained by the customer, and may include up to eight (8) separate telephone numbers. In the event of an interruption in Speed Dialing-8 service, the customer is responsible for reestablishing the speed calling list.

.3.20 Speed Dialing-30 - permits the customer to call other telephone numbers by dialing a two digit code rather than the complete telephone number. The speed calling list is established and maintained by the customer, and may include up to thirty (30) separate telephone numbers. In the event of an interruption in Speed Dialing-30 service, the customer is responsible for reestablishing the speed calling list.

.3.21 Three-way Calling - permits adding a third party to an established call without Company operator assistance.

NOTE: The grade of transmission on threeway calls may vary depending on the distance and routing necessary to complete the call. Therefore, the normal grade end-to-end transmission is not guaranteed.

.3.22 Priority Call - allows a customer to program up to twelve (12) telephone numbers of selected callers enabling the customer to distinguish certain incoming calls from all others by a distinctive ring tone. If a customer also subscribes to Call Waiting, calls from the selected numbers will be distinguished by a distinctive call waiting tone.

.3.23 Caller ID - permits a customer to receive both the name and telephone number associated with the calling party. Caller ID is forwarded from the terminating central office to compatible customer provided equipment. If the Caller ID is not available for forwarding to the called party, a message indicating that unavailability will be forwarded. A maximum of 15 characters is allowed for transmission of the calling party name.

.3.24 Anonymous Call Block (ACB) - allows a customer to reject calls from callers who have activated the Selective Blocking feature in order to prevent the display of their telephone number. ACB is activated or deactivated by dialing a preassigned code. When ACB is activated, such calls will be routed to an announcement which tells the caller that the called party will not accept calls from callers who have chosen to prevent the display of their telephone numbers. The calling party will be instructed to hang up and place the call again without activating the Cancel Caller ID service.

.3.25 Call Intercept - Call Intercept is an optional enhancement to Caller ID-Number Only and Caller ID. It provides residential Caller ID customers with informed choices about accepting or rejecting unidentified calls that typically appear as "Anonymous", "Unavailable", "Out of Area" or "Private", by requiring identification of the calling party as a condition of call completion. The unidentified caller is prompted by a recorded message to record a person or business name. Once recorded, Call Intercept calls the subscribing customer's line and displays the words "Call Intercept" on the Caller ID box. When the customer answers, Call Intercept plays the recorded name. The subscriber can then choose from one of the following options:

N  
|  
N

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GENERAL SERVICES (Continued)

1. Custom Local Area Signaling Service (CLASS)

.1 General

.1.2 Custom Local Area Signaling Services (CLASS) are available from suitably equipped central offices.

- a. Custom Local Area Signaling Service (CLASS) features include\*69, Priority Call, Do Not Disturb, Call Block, Busy Redial, Select Call Forwarding, Special Call Waiting, Caller ID, Cancel Calling Number Delivery - Per Call, and Call Trace. CLASS is a calling service offered to single and multiline residential and business customers.

.2 Conditions

.2.1 Custom Local Area Signaling Service restrictions:

b. Custom Local Area Signaling Service (CLASS) restrictions:

- b.1 CLASS features are subject to available facilities and limited to central offices specifically equipped to provide such service. CLASS features are applicable to calls placed to/from compatible central offices offering this service.

b.2 Operator assisted calls may override CLASS features.

b.3 Pay Telephone Service will not be enabled with CLASS features. They will operate with the CLASS system, however, and interaction with all the features will be permitted.

b.4 Call Intercept feature:

Call Intercept is available only to residence customers.

Customers must subscribe to Caller ID (Name and Number) or Caller ID-Number Only to use Call Intercept Service.

Call Intercept is only offered where technically available.

Customers cannot have Call Intercept and Remote Call Forwarding on the same line.

N  
|  
N

.3 Feature Descriptions

.3.1 Busy Redial - allows a customer to activate automatic later placement of their call. When a busy signal is reached, the call is queued for up to 30 minutes and is automatically retried until both parties are available. The call is not automatically retried for periods longer than 30 minutes.

.3.2 \*69 - allows a customer to automatically return the last incoming call by feature activation, whether or not it was answered. If the line is busy, the call is queued for up to 30 minutes or until both numbers are idle. The customer is given an indication that the network will attempt to set up the call when the called line is idle. When the called line is free, the customer's line rings, then the other number rings.

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GENERAL SERVICES (Continued)

1. Custom Local Area Signaling Service (CLASS) (Continued)

.3 Feature Descriptions (Continued)

- .3.3 Call Block - allows a customer to block calls from certain numbers (maximum of 12) known to the customer. The customer also can block incoming calls placed from the last calling number even if the number is unknown to the customer. Blocked calls are routed to a recorded announcement which specifies that the called party is not accepting calls.
- .3.4 Call Trace - allows the customer to immediately and automatically trace the last incoming call answered from a local service area in which Custom Local Area Signalling Service (CLASS) features are offered. Upon the customer's request, the trace information will be provided to law enforcement agencies by the Company, but will not be released directly to the customer. To initiate the call trace, the customer must contact the Company at the number provided in the voice announcement within ten (10) days of the incident. Call Trace performs the function of recording call information, but in no way identifies the person(s) actually placing the call(s). By accepting the service, the customer agrees that Verizon shall not be liable for damages due to an inability to trace the call(s). T  
T  
T
- .3.5 Caller ID - Number Only - provides for the display of the incoming telephone number on a customer provided display device attached to the customer's telephone line or on a telephone or answering machine with a built-in display screen. The Caller ID – Number Only feature will forward the calling number from the appropriately equipped central office to the customer provided display device. The Company will forward all telephone numbers subject to technical limitations. T  
T
- All customer provided equipment used to interface with Caller ID – Number Only must be connected in accordance with the provisions of the Federal Communication Commission's Registration Program. T
- .3.6 Selective Blocking - Per Call - provides free per call blocking in exchanges where Caller ID is offered by the Company. Customers may prevent the delivery of their telephone number to the called party. This is accomplished on a per call basis when the customer dials the Selective Blocking - Per Call activation code (\*67 for touch call lines and 1167 for rotary lines) prior to placing the call. T

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GENERAL SERVICES (Continued)

1. Custom Local Area Signaling Service (CLASS) (Continued)

.3 Feature Descriptions (Continued)

.3.7 Do Not Disturb - allows a customer to select specific telephone numbers (maximum of 12) from which calls are to be received. All other calls are intercepted and routed to a recorded announcement that informs the caller the customer is not accepting calls.

.3.8 Select Call Forwarding - is an arrangement which permits a customer to prespecify telephone numbers (maximum of 12), from which calls are to be forwarded. During the period that Select Call Forwarding is activated, only calls from one of the prespecified numbers will be forwarded.

.3.9 Special Call Waiting - allows a customer to choose the numbers (maximum of 12) which can activate Call Waiting. Calls placed from numbers not selected by the customer receive busy signals, when the customer's line is busy. Customers may not subscribe to Call Waiting and Special Call Waiting on the same line.

X  
|  
X

.3.10 Priority Call - allows a customer to program up to twelve (12) telephone numbers of selected callers enabling the customer to distinguish certain incoming calls from all others by a distinctive ring tone. If a customer also subscribes to Call Waiting, calls from the selected numbers will be distinguished by a distinctive call waiting tone.

.3.11 Caller ID - permits a customer to receive both the name and telephone number associated with the calling party. Caller ID is forwarded from the terminating central office to compatible customer provided equipment. If the Caller ID is not available for forwarding to the called party, a message indicating that unavailability will be forwarded. A maximum of 15 characters is allowed for transmission of the calling party name.

.3.12 Anonymous Call Block (ACB) - allows a customer to reject call from callers who have activated the Selective Blocking feature in order to prevent the display of their telephone number. ACB is activated or deactivated by dialing a preassigned code. When ACB is activated, such calls will be routed to an announcement which tells the caller that the called party will not accept calls from callers who have chosen to prevent the display of their telephone numbers. The calling party will be instructed to hang up and place the call again without activating the Selective Blocking feature.

3.13 Distinctive Ring - This service allows distinctive ringing to be applied to an individual line where each of two numbers, a main number and a "Distinctive Ring" number, will have a uniquely distinctive ring for customer identification. Because two telephone numbers are associated with one telephone line, only one conversation can be conducted at a time.

N  
|  
N

Regulations for directory listings set forth in this Tariff will apply for the main number. The customer is entitled to one free listing in the alphabetical section of the telephone directory for the "Distinctive Ring" number, regardless of the class of service.

X – This service is grandfathered to existing customers at existing locations.

PLEASE READ - Contains important information about the terms and conditions  
of your service.

September 10, 2007

Dear Valued Customer:

We are very happy to have you as a Verizon customer. Your satisfaction is  
important to us and we wanted to respond right away.

This letter confirms:

- o service(s) you recently ordered
- o your order number

**You can reach us by calling toll-free at 1-800-483-4000.**

Our business office hours are 8:00 AM to 6:00 PM Monday - Friday. If you should  
need to reach Repair, please call 1-800-483-1000 any time. You can also visit  
your nearest Verizon Plus store or write to us at Verizon, P.O. Box 11328, St.  
Petersburg, FL 33733-1328. TTY customers can use 1-800-974-6006.

We're delighted to be your telecommunications provider and take your  
satisfaction personally. Additional Verizon services, bills, area code changes,  
and regional calling areas, can be found on our website at [verizon.com](http://verizon.com). For  
details on customer rights and responsibilities, please see the Customer  
Information Guide in your local telephone directory.

Sincerely,



Edward L. Googe  
Director, Voice Product Management

<customer name>  
<customer address>  
ROCKTON IL 61072

## VERIZON FREEDOM VALUE

You have chosen Verizon Freedom Value(sm). Now, you'll enjoy significant savings on just about all of your communication calling needs and pay one low monthly rate of \$39.99.

Now that you've signed up for Verizon Freedom Value, you'll get unlimited direct-dialed local and regional toll calling. And you'll also get unlimited direct-dialed long distance calling to anywhere in the U.S. and certain U.S. territories, anytime, any day. So you can make as many local and regional toll calls as you like--talk for as long as you want--and never worry about the price of the call.

### Verizon can help you save in other ways, too.

There is no one-time charge to establish Verizon Freedom Value. And as a Verizon Freedom Value customer who has purchased a qualifying plan, you may be eligible for special deals on other Verizon products and services, including high-speed broadband Internet service. To take advantage of these special savings, please contact us at our convenient customer service number located on the first page of this letter. If you've already signed up for high-speed broadband Internet service, you'll be receiving additional information soon.

#### Consumer Information:

Verizon Freedom Value includes unlimited direct-dialed domestic long distance service (including calling to Canada, Guam, Puerto Rico, American Samoa, the U.S. Virgin Islands and the Northern Mariana Islands), brought to you by Verizon Long Distance. A \$12.95 portion of the monthly plan rate is associated with long distance services. International, operator assisted, calling card and Personal Toll-Free calls are not included in the monthly plan rate. All other services that are part of Verizon Freedom Value are provided by your Verizon local exchange company. Verizon Freedom Value does not provide an itemization of direct-dialed domestic calls covered by the plan on the monthly bill. International, operator assisted, calling card and Personal Toll-Free calls will be itemized.

If you drop the local service portion of the plan, you will no longer be entitled to unlimited direct-dialed domestic long distance calling. If you remain subscribed to Verizon Long Distance and do not choose another plan, you will automatically be defaulted to the Verizon Long Distance TalkTime(sm) 30 Plan.\*

Verizon Freedom Value is for residential customers. Offer is for voice use only. It is not available for business customers or residential customers with usage that is substantially higher than average residential usage. With respect to long distance usage, average residential use will be determined by Verizon Long Distance based on the average minutes by residential customers of long distance usage on the Verizon Freedom Value plan. Average residential use will exclude use for non-residential purposes. If you have substantially more than average residential use, Verizon Long Distance will regard this as non-residential use and, after notifying you, will change your plan to the Verizon TalkTime 30 Plan.\*

If you change your long distance provider, Verizon Freedom Value will be removed from your account and you will be automatically placed on the Verizon Regional Value plan. This plan includes the same services as Verizon Freedom

Value, without the long distance feature. Verizon Freedom Value is provided pursuant to applicable tariffs and contract terms and conditions. Failure to pay your Freedom Value plan charges in full may result in a loss of some/all of your plan services. Rates, terms, conditions, functionality and availability may vary. Universal Service Fund fees, taxes and other charges apply.

\*The Verizon Long Distance TalkTime 30 Plan carries a monthly recurring charge of \$5.00 and provides 30 minutes of long distance calling. Usage beyond the 30 minutes is rated at 10 cents per minute for interstate calling. In-state long distance calling rates are as follows: CA: \$.07/min., FL, TX, WA, OR, ID, MI, OH, WI, IL, IN, NC, SC: \$.12/min.

Billing Number: 815-624-<xxxx>  
Order Number: 1xxxxxxx  
Date of Request: 09/08/2007

Activity Qty. Description

ADD	1	VERIZON FREEDOM VALUE
	1	LEC PRODUCTS GROUP - VFV
	1	VERIZON FREEDOM BUNDLE
	1	VERIZON FREEDOM VALUE LD
	1	CALLER ID
	1	INTERSTATE ACCESS CHARGE
	1	RESIDENCE LINE - MEASURED RATE

Applicable discounts will appear on your bill.

Verizon uses electronic fund transfer to process check payments. Your payment may look like an electronic fund transfer from your account and you will not receive a cancelled check from your bank. Verizon will keep an image of your check in case there is a dispute. If you wish to be excluded from this process, please call 1-888-500-5358.

All monthly service charges are billed one month in advance. For all services and packages, your first bill may show a partial month charge (which includes charges as of the day the service or package was installed up to the first billing date). If the first bill you receive includes a partial month charge, the bill may be higher than a normal one-month bill. If applicable, charges for connecting or changing other services usually appear on the first bill.

If your bill seems higher than expected, it may include partial month charges. You will find additional billing information and explanations on our website at [www.verizon.com/helpconsumer](http://www.verizon.com/helpconsumer).

You have requested VERIZON to provide your IntraLATA long distance service. We recommend that you contact your chosen IntraLATA carrier to confirm that an account has been or is being established for you. Additional information pertaining to local exchange service may be found in the consumer information guide of the local telephone directory.

You have requested VERIZON LONG DISTANCE to provide your InterLATA long distance service. We recommend that you contact your chosen InterLATA carrier to confirm that an account has been or is being established for you. Additional information pertaining to local exchange service may be found in the consumer information guide of the local telephone directory.

This statement does not reflect Taxes and Surcharges. New or changed telephone number assignment is not guaranteed. Verizon assumes no liability in the event a different number is assigned. Verizon is required by the utilities commission to charge the rates that are listed in our tariffs. Should there be a conflict between the quoted rate and the tariff, the tariffed rate will prevail.



## **Important User Instructions**

Here are the instructions for using your Calling Service(s). Please keep this document in a convenient place near your telephone.

### **Caller ID**

Caller ID lets you see the name and number of the person calling. The information will appear between the first and second rings on a display device. Devices vary in design, available features, and the amount of names/numbers that can be stored. Caller ID will display numbers or names and numbers of most calls, including long distance. Some calls may appear as "Out-of-Area" or "Unavailable." If the person calling you has blocked the display of his/her name and number, the letter "P" or the word "Private" or "Anonymous" will appear. You can block these calls with Anonymous Call Block.

Other important tips:

- o Some names and numbers cannot be called back, either because they do not accept incoming calls or they are the main number of a business.
- o Caller ID devices can be used with most answering machines if the machine is set to pick up calls after the second ring.
- o A special Caller ID display device must be purchased separately.
- o Caller ID - Number Only displays only the caller's number.

### **Selective Blocking**

With Selective Blocking (also known as Per Call Blocking), you can prevent your number from being displayed on other peoples Caller ID equipment one call at a time.

To Block The Display of Your Number:

1. Lift the handset and listen for a dial tone.
2. Press \* 6 7. (Rotary dial 1-1-6-7.)
3. Listen for the confirmation tone, followed by dial tone.
4. Place the call and your number will NOT be displayed, for that call only.

Other important tips:

- o Calls to 911, toll-free numbers and 700/900 services cannot be blocked.
- o Non-listed or non-published numbers will be displayed unless they are blocked.  
For help, call 1-800-483-1000. Visit us at [verizon.com](http://verizon.com)